

CHRISTOPHER A. DAVIS

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RICHARD SCHUELER aka RICHARD HEART, HEX, PULSECHAIN, and PULSEX

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**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

**SECURITIES AND EXCHANGE  
COMMISSION,  
Plaintiff,**

**vs.**

**RICHARD SCHUELER aka RICHARD  
HEART, HEX, PULSECHAIN, and  
PULSEX  
Defendants.**

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**Case No. 1-23-cv-5749  
NOTICE OF MOTION  
TO ADMIT COUNSEL  
PRO HAC VICE**

TO: Opposing Counsel

Matthew J. Gulde

PLEASE TAKE NOTICE that upon the annexed affidavit of movant in support of this motion and the Certificate(s) of Good Standing annexed thereto, I Christopher A. Davis will move this Court pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York for an order allowing the admission of movant, a member of the firm of Gray Reed & McGraw, LLP and a member in good standing of the bar of the State of Texas, as attorney pro hac vice to argue or try this case in whole or in part as counsel for Richard Schueler aka Richard Heart, Hex, Pulsechain, and PulseX. There are no pending disciplinary proceedings against me in any state or federal court.

DATED: January 12, 2024

Respectfully submitted,

GRAY REED & MCGRAW, LLP

By: /s/ Chris Davis

Christopher A. Davis

State Bar No. 24050483

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COUNSEL FOR DEFENDANTS,

RICHARD SCHUELER aka RICHARD HEART, HEX,

PULSECHAIN, and PULSEX